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October 17, 2001

Via Federal Express

Document Processing Center (7407)
Room G99 East Tower
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460-0001

Dear 8(e) Coordinator:

Substituted Heterocycle 101701 A
Substituted Heterocycle 101701 B
Substituted Heterocycle 101701 C
Substituted Heterocycle 101701 D
Substituted Heterocycle 101701 E
Substituted Heterocycle 101701 F
Substituted Heterocycle 101701 G

This letter is to inform you of the results of several oral toxicity studies in rats. The test substances were administered once to rats at doses of 25, 50, 100, 250, 500, or 1000 mg/kg. The doses varied for each compound. The surviving rats were observed for clinical signs of toxicity on the day of dosing and over a 14-day observation period.

The rats exhibited salivation, forelimb clasp, leaning, abnormal breathing, prostration, vocalization, spasms, head tilt, paralysis, rapid onset of rigor, and/or high carriage. Other clinical signs observed included not moving or no reflexes in limbs, paleness, and/or enophthalmos. Some of these clinical signs were observed in surviving animals and some were observed in moribund animals. All of the clinical signs were observed on the day of dosing. The approximate lethal dose for Substituted Heterocycle 101701F was less than or equal to 25 mg/kg. The approximate lethal doses for the remaining test substances were 250 mg/kg or above.

Under these experimental conditions, the clinical signs described above would appear to be reportable, based on EPA guidance regarding the reportability of such data under TSCA Section 8(e) criteria.

Sincerely,

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CBI Substantiation

Support for [ ] claim of confidential business information for the information claimed as CBI is provided.

1. Confidential treatment should be afforded for ten years. Information should remain confidential until that time [ ]

2. No.

3. [ ] identity and the chemical identity [ ] are only disclosed to a second party [ ] under a nondisclosure (secrecy) agreement. [ ] has not otherwise disclosed the information claimed as CBI to other parties.

4. All documents relating to [ ]are stored in locked, limited-access facilities and designated as proprietary, trade secret or confidential. [ ] having access to the information are contractually prohibited from disclosing [ ] proprietary/confidential information outside the [ ].

5. No.

6. Yes. [ ] Disclosure of the CBI information would permit a competitor to specifically know and understand [ ] efforts and to forego the necessary time and expense to identify/develop this compound, thus capitalizing on [ ]. [ ] believes that a competitor's knowledge of the chemical identity [ ]interest in this compound would give a competitor several years advantage [ ] and would allow it to forego much of the R&D costs that it would otherwise have to bear. [ ].

7. a. No.

   b. Yes. The chemical identity [ ] would, potentially, disclose proprietary mixture [ ].

   c. Yes. Disclosure of [ ] would reveal the identity and source of the [ ].